

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSE ANN PAGUIRIGAN, individually and
on behalf of all others similarly situated, :

Plaintiff, : 1:17 Civ. 1302 (NG) (JO)

-vs- : **NOTICE OF MOTION**

PROMPT NURSING EMPLOYMENT AGENCY :
LLC d/b/a SENTOSA SERVICES, :
SENTOSACARE LLC, SENTOSA NURSING :
RECRUITMENT AGENCY, BENJAMIN LANDA, :
BENT PHILIPSON, BERISH RUBENSTEIN a/k/a :
BARRY RUBENSTEIN, FRANCIS LUYUN, :
GOLDEN GATE REHABILITATION & HEALTH :
CARE CENTER LLC, and SPRING CREEK :
REHABILITATION AND NURSING CENTER, :

Defendants. :

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PLEASE TAKE NOTICE that, upon the annexed Declaration of John J.P. Howley, the exhibits annexed thereto, the accompanying memorandum of law and Rule 56.1 Statement, and all prior proceedings herein, plaintiff Rose Ann Paguirigan, individually and on behalf the certified class, will move this Court, before the Honorable Nina Gershon, at the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, on September 27, 2020, or as soon thereafter as counsel may be heard, for an order and judgment, pursuant to Rules 54(b) and 56 of the Federal Rules of Civil Procedure: (a) awarding class members compensatory damages in the amount of \$1,559,099.79, plus pre-judgment interest at 9% per annum, jointly and severally against defendants Prompt Nursing Employment Agency LLC, Berish Rubenstein, and Bent Philipson for breach of contract; (b) awarding class members \$1,559,099.79 in compensatory damages, plus interest at the federal rate, jointly and severally against each

defendant named in this action for violations of the Trafficking Victims Protection Act, 18 U.S.C. §§ 1589, *et seq.* (TVPA); (c) awarding class members \$1,559,099.79 in punitive damages against each defendant, jointly and severally, for violations of the TVPA; (d) awarding plaintiffs reasonable attorneys' fees and the costs of this action as authorized by 18 U.S.C. § 1595(a); and (e) granting such other relief as the Court deems just.

Dated: New York, New York
August 25, 2020

Respectfully submitted,

THE HOWLEY LAW FIRM P.C.

By: /s/ John J.P. Howley
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